

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

UNITED STATES OF AMERICA,

v.

**MOHAMMAD EBRAHIM TORKI
HARCHEGANI,**

DEFENDANT.

CR. NO. 3:25-54

MOTION FOR CONTINUANCE

Now comes the defendant, **MOHAMMAD TORKI HARCHEGANI**, by and through his appointed counsel Suha S. Najjar, Assistant Federal Public Defender, who respectfully requests the court to continue the jury selection of this case, currently scheduled for June 4, 2025, until the August 6, 2025 term of court. The pretrial conference in the case is currently scheduled for May 27, 2025. Assistant United States Attorney, Elle Klein, has been consulted and she consents to this continuance. This motion is made on the following grounds:

Counsel needs additional time to review discovery, conduct a thorough investigation, and review the discovery with the defendant. Additionally, a continuance would allow the parties more time to negotiate a resolution to the case.

Defense counsel represents to the court that she has discussed this continuance with the defendant, and he consents to the continuance. The defendant acknowledges that he understands that the time occasioned by this delay shall be excluded from consideration under 18 U.S.C. § 3161, et seq., The Speedy Trial Act.

[Signatures on Following Page]

As outlined above, and with the consent of all parties, the Defense moves for a continuance.

Respectfully submitted,

s/Suha S. Najjar

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May 21, 2025

I CONSENT:

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

By: s/Elle Klein

Assistant United States Attorney

I CONSENT:



MOHAMMAD TORKI HARCHEGANI
Defendant